

Rec'd in
DMG 10/15/98



Department of Energy
Germantown, MD 20874-1290

JUL 01 1998

MEMORANDUM FOR

John P. Kennedy, Acting Manager, Chicago Operations Office
James M. Turner, Manager, Oakland Operations Office
Bruce G. Twining, Manager, Albuquerque Operations Office
James C. Hall, Manager, Oak Ridge Operations Office
John D. Wagoner, Manager, Richland Operations Office

SUBJECT:

Blanket Delegation of Approval Authority for Oak Ridge
Operations Contractor Price-Anderson Amendments Act
Documents

The Oak Ridge Operations Office (ORO) has requested the Office of Energy Research ((ER) to provide it with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, Quality Assurance Requirements, and 10 CFR 835, Occupational Radiation Protection. The Office of Environmental Management (EM) provided such authority on April 10, 1998, and the ORO is also requesting a blanket delegation from the Offices of Defense Programs and Nuclear Energy.

With a few exceptions, ER has already delegated approval authority for Quality Assurance Programs (QAPs) and subsequent revisions submitted under 10 CFR 830.120 to the Operations Offices in a memorandum dated July 28, 1994. The exceptions are if QAPs are from a new contractor, contain exemption requests, request additional funding, or contain programmatic schedule impacts. Authority to approve changes to existing QAPs and Radiation Protection Programs submitted under 10 CFR 830.120 and 835 for ER work was provided to ORO, by ER, on December 30, 1998.

ER is further willing to delegate approval authority to Operations Office Managers for approval of new contractors' Quality Assurance Programs under 10 CFR 830.120, and Radiation Protection Plans under 10 CFR 835, provided that:

- the Review Team Leader(s) will continue to ensure that the appropriate ER staff participate on the review team for the program documents and significant revisions thereto,
- program changes that involve increased funding or significant schedule changes must be forwarded to Headquarters for approval,

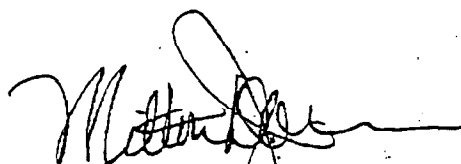
RETAIN
PERMANENTLY

SDOA-SC-10



- in accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval, and
- copies of approved PAAA documents are forwarded to ER.

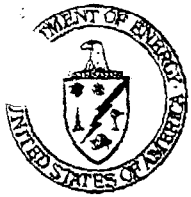
Please contact Mr. Matt Cole (301-903-8388) or Mr. Barry Parks (301-903-9649) if you have any questions.



Milton D. Johnson
Associate Director
Office of Laboratory Operations
and ES&H

cc:

J. Adachi, CH
C. Mansfield, CH
K. Whitham, ID
E. Camaddo, OAK
J. Ahlquist, OAK
E. Njoku, OAK
E. Cumesty, OR
R. Poe, OR
R. Brown, OR
M. McBride, OR
M. Henderson, OR
T. Larkin, OR
J. Weese, OR
D. Christensen, AL
G. Runkle, AL
D. Rose, AL
D. Pellegrino, AL
M. Flannigan, CH
M. Hendeson, OR
B. Pangborn, RL
C. Kasch, RL
B. Fiscus, RL
G. Bell, RL



Department of Energy
Germantown, MD 20874-1290

JUL 01 1998

MEMORANDUM FOR

John P. Kennedy, Acting Manager, Chicago Operations Office
James M. Turner, Manager, Oakland Operations Office
Bruce G. Twining, Manager, Albuquerque Operations Office
James C. Hall, Manager, Oak Ridge Operations Office
John D. Wagoner, Manager, Richland Operations Office

SUBJECT:

Blanket Delegation of Approval Authority for Oak Ridge
Operations Contractor Price-Anderson Amendments Act
Documents

The Oak Ridge Operations Office (ORO) has requested the Office of Energy Research ((ER) to provide it with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, Quality Assurance Requirements, and 10 CFR 835, Occupational Radiation Protection. The Office of Environmental Management (EM) provided such authority on April 10, 1998, and the ORO is also requesting a blanket delegation from the Offices of Defense Programs and Nuclear Energy.

With a few exceptions, ER has already delegated approval authority for Quality Assurance Programs (QAPs) and subsequent revisions submitted under 10 CFR 830.120 to the Operations Offices in a memorandum dated July 28, 1994. The exceptions are if QAPs are from a new contractor, contain exemption requests, request additional funding, or contain programmatic schedule impacts. Authority to approve changes to existing QAPs and Radiation Protection Programs submitted under 10 CFR 830.120 and 835 for ER work was provided to ORO, by ER, on December 30, 1998.

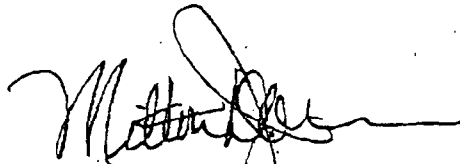
ER is further willing to delegate approval authority to Operations Office Managers for approval of new contractors' Quality Assurance Programs under 10 CFR 830.120, and Radiation Protection Plans under 10 CFR 835, provided that:

- the Review Team Leader(s) will continue to ensure that the appropriate ER staff participate on the review team for the program documents and significant revisions thereto,
- program changes that involve increased funding or significant schedule changes must be forwarded to Headquarters for approval,



- in accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval, and
- copies of approved PAAA documents are forwarded to ER.

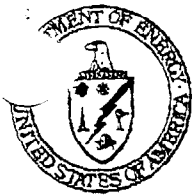
Please contact Mr. Matt Cole (301-903-8388) or Mr. Barry Parks (301-903-9649) if you have any questions.



Milton D. Johnson
Associate Director
Office of Laboratory Operations
and ES&H

cc:

J. Adachi, CH
C. Mansfield, CH
K. Whitham, ID
E. Camaddo, OAK
J. Ahlquist, OAK
E. Njoku, OAK
E. Cumesty, OR
R. Poe, OR
R. Brown, OR
M. McBride, OR
M. Henderson, OR
T. Larkin, OR
J. Weese, OR
D. Christensen, AL
G. Runkle, AL
D. Rose, AL
D. Pellegrino, AL
M. Flannigan, CH
M. Hendeson, OR
B. Pangborn, RL
C. Kasch, RL
B. Fiscus, RL
G. Bell, RL



Department of Energy
Germantown, MD 20874-1290

JUL 01 1998

MEMORANDUM FOR

John P. Kennedy, Acting Manager, Chicago Operations Office
James M. Turner, Manager, Oakland Operations Office
Bruce G. Twining, Manager, Albuquerque Operations Office
James C. Hall, Manager, Oak Ridge Operations Office
John D. Wagoner, Manager, Richland Operations Office

SUBJECT:

Blanket Delegation of Approval Authority for Oak Ridge
Operations Contractor Price-Anderson Amendments Act
Documents

The Oak Ridge Operations Office (ORO) has requested the Office of Energy Research ((ER) to provide it with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, Quality Assurance Requirements, and 10 CFR 835, Occupational Radiation Protection. The Office of Environmental Management (EM) provided such authority on April 10, 1998, and the ORO is also requesting a blanket delegation from the Offices of Defense Programs and Nuclear Energy.

With a few exceptions, ER has already delegated approval authority for Quality Assurance Programs (QAPs) and subsequent revisions submitted under 10 CFR 830.120 to the Operations Offices in a memorandum dated July 28, 1994. The exceptions are if QAPs are from a new contractor, contain exemption requests, request additional funding, or contain programmatic schedule impacts. Authority to approve changes to existing QAPs and Radiation Protection Programs submitted under 10 CFR 830.120 and 835 for ER work was provided to ORO, by ER, on December 30, 1998.

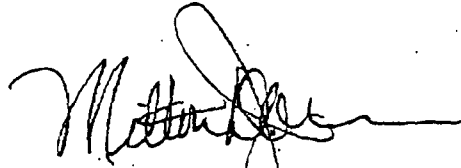
ER is further willing to delegate approval authority to Operations Office Managers for approval of new contractors' Quality Assurance Programs under 10 CFR 830.120, and Radiation Protection Plans under 10 CFR 835, provided that:

- the Review Team Leader(s) will continue to ensure that the appropriate ER staff participate on the review team for the program documents and significant revisions thereto,
- program changes that involve increased funding or significant schedule changes must be forwarded to Headquarters for approval,



- in accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval, and
- copies of approved PAAA documents are forwarded to ER.

Please contact Mr. Matt Cole (301-903-8388) or Mr. Barry Parks (301-903-9649) if you have any questions.



Milton D. Johnson
Associate Director
Office of Laboratory Operations
and ES&H

cc:

J. Adachi, CH
C. Mansfield, CH
K. Whitham, ID
E. Camaddo, OAK
J. Ahlquist, OAK
E. Njoku, OAK
E. Cumesty, OR
R. Poe, OR
R. Brown, OR
M. McBride, OR
M. Henderson, OR
T. Larkin, OR
J. Weese, OR
D. Christensen, AL
G. Runkle, AL
D. Rose, AL
D. Pellegrino, AL
M. Flannigan, CH
M. Hendeson, OR
B. Pangborn, RL
C. Kasch, RL
B. Fiscus, RL
G. Bell, RL



Department of Energy
Germantown, MD 20874-1290

E. Cumesty
Oak Ridge Operations Office
200 Administration Road
Oak Ridge, TN 37830

JUL 01 1998

MEMORANDUM FOR

John P. Kennedy, Acting Manager, Chicago Operations Office
James M. Turner, Manager, Oakland Operations Office
Bruce G. Twining, Manager, Albuquerque Operations Office
James C. Hall, Manager, Oak Ridge Operations Office
John D. Wagoner, Manager, Richland Operations Office

SUBJECT:

Blanket Delegation of Approval Authority for Oak Ridge
Operations Contractor Price-Anderson Amendments Act
Documents

The Oak Ridge Operations Office (ORO) has requested the Office of Energy Research (ER) to provide it with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, Quality Assurance Requirements, and 10 CFR 835, Occupational Radiation Protection. The Office of Environmental Management (EM) provided such authority on April 10, 1998, and the ORO is also requesting a blanket delegation from the Offices of Defense Programs and Nuclear Energy.

With a few exceptions, ER has already delegated approval authority for Quality Assurance Programs (QAPs) and subsequent revisions submitted under 10 CFR 830.120 to the Operations Offices in a memorandum dated July 28, 1994. The exceptions are if QAPs are from a new contractor, contain exemption requests, request additional funding, or contain programmatic schedule impacts. Authority to approve changes to existing QAPs and Radiation Protection Programs submitted under 10 CFR 830.120 and 835 for ER work was provided to ORO, by ER, on December 30, 1998.

ER is further willing to delegate approval authority to Operations Office Managers for approval of new contractors' Quality Assurance Programs under 10 CFR 830.120, and Radiation Protection Plans under 10 CFR 835, provided that:

- the Review Team Leader(s) will continue to ensure that the appropriate ER staff participate on the review team for the program documents and significant revisions thereto,
- program changes that involve increased funding or significant schedule changes must be forwarded to Headquarters for approval,



Printed with soy ink on recycled paper

- in accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval, and
- copies of approved PAAA documents are forwarded to ER.

Please contact Mr. Matt Cole (301-903-8388) or Mr. Barry Parks (301-903-9649) if you have any questions.



Milton D. Johnson
Associate Director
Office of Laboratory Operations
and ES&H

cc:

J. Adachi, CH
C. Mansfield, CH
K. Whitham, ID
E. Camaddo, OAK
J. Ahlquist, OAK
E. Njoku, OAK
E. Cumesty, OR
R. Poe, OR
R. Brown, OR
M. McBride, OR
M. Henderson, OR
T. Larkin, OR
J. Weese, OR
D. Christensen, AL
G. Runkle, AL
D. Rose, AL
D. Pellegrino, AL
M. Flannigan, CH
M. Hendeson, OR
B. Pangborn, RL
C. Kasch, RL
B. Fiscus, RL
G. Bell, RL

United States Government

Department of Energy
Oak Ridge Operations

Memorandum

DATE: May 11, 1998

REPLY TO

ATTN OF: AD-440:Rosenstrom

SUBJECT: **REQUEST FOR BLANKET DELEGATION OF APPROVAL AUTHORITY FOR OAK RIDGE OPERATIONS' CONTRACTOR PRICE-ANDERSON AMENDMENTS ACT DOCUMENTS**

TO: Martha A. Krebs, Director, Office of Energy Research, ER-1, Room 7B-058, FORS

We propose that Oak Ridge Operations (ORO) be provided with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and/or 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. DOE M 411.1-1, Section 7.4.1.6, "Nuclear Safety Rule Implementation Plans, Programs, and Procedures" states that approval authority can be delegated to the Field Element Manager. We feel that having this approval authority will expedite review and approval of these documents. ORO is also requesting a blanket delegation of approval authority from the offices of Defense Programs and Nuclear Energy. The Office of Environmental Management delegated approval authority to ORO on April 10, 1998, and a copy of that memorandum is attached.

It is customary for the ORO Review Team Leader(s) to begin discussions early with contractors to ensure a clear understanding of expectations for the Quality Assurance Program and/or Radiation Protection Program documents. A staff member from your organization will be asked to participate on the review team for the program documents and significant revisions thereto. In addition, ORO will provide a copy of approved documents to your office.

ORO will ensure that funding requirements for Price-Anderson Amendments Act programs remain consistent with current budget allocations and out year targets. Program changes that involve increased funding will be forwarded to Headquarters for approval. Further, in accordance with 10 CFR 820, all requests for exemptions and program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

This delegation of approval authority will not be used to approve subcontractor program documents. Having separate subcontractor programs can weaken the prime contractor's accountability and increase costs, since ORO would be paying for redundant plans. Prime contractors will be held accountable for all work, whether they are conducting it directly or through subcontractors. We will inform you promptly if this approach changes.

**RETAIN
PERMANENTLY**

SC-10-01

Please sign the attached memorandum and fax it to the ORO Directives Management Group at (423) 576-4046. If you have questions, please call Dawn Rosenstrom at (423) 576-4045.

Steven D. Richardson
for James C. Hall
Manager

Attachments

cc w/attachments:

E. G. Cumesty, LM-10

R. W. Poe, SE-30

R. J. Brown, M-7

M. H. McBride, SE-33

M. D. Henderson, SE-33

T. A. Larkin, SE-32

J. A. Weese, SE-32

D. Michlewicz, ER-80

DELEGATION OF APPROVAL AUTHORITY

Approval authority is hereby delegated to the Manager, Oak Ridge Operations, for all Price-Anderson Amendment Act (PAAA) documents developed by contractors to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. ORO must forward copies of approved PAAA documents to the Office of Energy Research.

However, program changes that involve increased funding must be forwarded to Headquarters for approval. In accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

Martha A. Krebs
Director, Office of Energy Research, ER-1

Date

NOTE:

Please fax the signed form to Dawn Rosenstrom, AD-440, at (423) 576-4046.

United States Government

Memorandum

DATE: May 11, 1998

REPLY TO

ATTN OF: AD-440:Rosenstrom

SUBJECT: **REQUEST FOR BLANKET DELEGATION OF APPROVAL AUTHORITY FOR OAK RIDGE OPERATIONS' CONTRACTOR PRICE-ANDERSON AMENDMENTS ACT DOCUMENTS**

to: Martha A. Krebs, Director, Office of Energy Research, ER-1, Room 7B-058, FORS

We propose that Oak Ridge Operations (ORO) be provided with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and/or 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. DOE M 411.1-1, Section 7.4.1.6, "Nuclear Safety Rule Implementation Plans, Programs, and Procedures" states that approval authority can be delegated to the Field Element Manager. We feel that having this approval authority will expedite review and approval of these documents. ORO is also requesting a blanket delegation of approval authority from the offices of Defense Programs and Nuclear Energy. The Office of Environmental Management delegated approval authority to ORO on April 10, 1998, and a copy of that memorandum is attached.

It is customary for the ORO Review Team Leader(s) to begin discussions early with contractors to ensure a clear understanding of expectations for the Quality Assurance Program and/or Radiation Protection Program documents. A staff member from your organization will be asked to participate on the review team for the program documents and significant revisions thereto. In addition, ORO will provide a copy of approved documents to your office.

ORO will ensure that funding requirements for Price-Anderson Amendments Act programs remain consistent with current budget allocations and out year targets. Program changes that involve increased funding will be forwarded to Headquarters for approval. Further, in accordance with 10 CFR 820, all requests for exemptions and program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

This delegation of approval authority will not be used to approve subcontractor program documents. Having separate subcontractor programs can weaken the prime contractor's accountability and increase costs, since ORO would be paying for redundant plans. Prime contractors will be held accountable for all work, whether they are conducting it directly or through subcontractors. We will inform you promptly if this approach changes.

Please sign the attached memorandum and fax it to the ORO Directives Management Group at (423) 576-4046. If you have questions, please call Dawn Rosenstrom at (423) 576-4045.

James C. Hall
Manager

Attachments

cc w/attachments:

E. G. Cumesty, LM-10
R. W. Poe, SE-30
R. J. Brown, M-7
M. H. McBride, SE-33
M. D. Henderson, SE-33
T. A. Larkin, SE-32
J. A. Weese, SE-32
D. Michlewicz, ER-80

CONTRACT
RTG. SYMBOL AD-440
INITIALS/SIG Rosenstrom
DATE 4/13/98
RTG. SYMBOL SE-33
INITIALS/SIG McBride
DATE 5/4/98
RTG. SYMBOL SE-30
INITIALS/SIG Poe
DATE 5/4/98
RTG. SYMBOL LM-10
INITIALS/SIG Cumesty
DATE 4/15/98
RTG. SYMBOL M-8
INITIALS/SIG Brown
DATE 5/7/98
RTG. SYMBOL M-7
INITIALS/SIG Brown
DATE 5/7/98
RTG. SYMBOL AD-40
INITIALS/SIG Willis
DATE 5/8/98
RTG. SYMBOL M-3
INITIALS/SIG Lovell
DATE 5/11/98
RTG. SYMBOL M-2
INITIALS/SIG Richardson
DATE 5/11/98
RTG. SYMBOL M-1
INITIALS/SIG Hall
DATE 5/11/98
RTG. SYMBOL
INITIALS/SIG
DATE

DELEGATION OF APPROVAL AUTHORITY

Approval authority is hereby delegated to the Manager, Oak Ridge Operations, for all Price-Anderson Amendment Act (PAAA) documents developed by contractors to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. ORO must forward copies of approved PAAA documents to the Office of Energy Research.

However, program changes that involve increased funding must be forwarded to Headquarters for approval. In accordance with 10 CFR 820, all requests for exemptions and/or program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

Martha A. Krebs
Director, Office of Energy Research, ER-1

Date

NOTE:

Please fax the signed form to Dawn Rosenstrom, AD-440, at (423) 576-4046.

United States Government

Department of Energy
Oak Ridge Operations

Memorandum

DATE: May 11, 1998

REPLY TO

ATTN OF: AD-440:Rosenstrom

SUBJECT: **REQUEST FOR BLANKET DELEGATION OF APPROVAL AUTHORITY FOR OAK RIDGE OPERATIONS' CONTRACTOR PRICE-ANDERSON AMENDMENTS ACT DOCUMENTS**

TO: Martha A. Krebs, Director, Office of Energy Research, ER-1, Room 7B-058, FORS

We propose that Oak Ridge Operations (ORO) be provided with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and/or 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. DOE M 411.1-1, Section 7.4.1.6, "Nuclear Safety Rule Implementation Plans, Programs, and Procedures" states that approval authority can be delegated to the Field Element Manager. We feel that having this approval authority will expedite review and approval of these documents. ORO is also requesting a blanket delegation of approval authority from the offices of Defense Programs and Nuclear Energy. The Office of Environmental Management delegated approval authority to ORO on April 10, 1998, and a copy of that memorandum is attached.

MAT
Cole
301-
903-
8388

It is customary for the ORO Review Team Leader(s) to begin discussions early with contractors to ensure a clear understanding of expectations for the Quality Assurance Program and/or Radiation Protection Program documents. A staff member from your organization will be asked to participate on the review team for the program documents and significant revisions thereto. In addition, ORO will provide a copy of approved documents to your office.

ORO will ensure that funding requirements for Price-Anderson Amendments Act programs remain consistent with current budget allocations and out year targets. Program changes that involve increased funding will be forwarded to Headquarters for approval. Further, in accordance with 10 CFR 820, all requests for exemptions and program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

This delegation of approval authority will not be used to approve subcontractor program documents. Having separate subcontractor programs can weaken the prime contractor's accountability and increase costs, since ORO would be paying for redundant plans. Prime contractors will be held accountable for all work, whether they are conducting it directly or through subcontractors. We will inform you promptly if this approach changes.

United States Government

Department of Energy
Oak Ridge Operations

Memorandum

DATE: May 11, 1998

REPLY TO

ATTN OF: AD-440:Rosenstrom

SUBJECT: **REQUEST FOR BLANKET DELEGATION OF APPROVAL AUTHORITY FOR OAK RIDGE OPERATIONS' CONTRACTOR PRICE-ANDERSON AMENDMENTS ACT DOCUMENTS**

TO: Martha A. Krebs, Director, Office of Energy Research, ER-1, Room 7B-058, FORS

We propose that Oak Ridge Operations (ORO) be provided with a blanket delegation of approval authority for contractor documents to meet 10 CFR 830.120, QUALITY ASSURANCE REQUIREMENTS, and/or 10 CFR 835, OCCUPATIONAL RADIATION PROTECTION. DOE M 411.1-1, Section 7.4.1.6, "Nuclear Safety Rule Implementation Plans, Programs, and Procedures" states that approval authority can be delegated to the Field Element Manager. We feel that having this approval authority will expedite review and approval of these documents. ORO is also requesting a blanket delegation of approval authority from the offices of Defense Programs and Nuclear Energy. The Office of Environmental Management delegated approval authority to ORO on April 10, 1998, and a copy of that memorandum is attached.

MAT
Cole
301-
903-
8388

It is customary for the ORO Review Team Leader(s) to begin discussions early with contractors to ensure a clear understanding of expectations for the Quality Assurance Program and/or Radiation Protection Program documents. A staff member from your organization will be asked to participate on the review team for the program documents and significant revisions thereto. In addition, ORO will provide a copy of approved documents to your office.

ORO will ensure that funding requirements for Price-Anderson Amendments Act programs remain consistent with current budget allocations and out year targets. Program changes that involve increased funding will be forwarded to Headquarters for approval. Further, in accordance with 10 CFR 820, all requests for exemptions and program documents that contain requests for exemptions to 10 CFR 830.120 or 10 CFR 835 shall be forwarded to Headquarters for approval.

This delegation of approval authority will not be used to approve subcontractor program documents. Having separate subcontractor programs can weaken the prime contractor's accountability and increase costs, since ORO would be paying for redundant plans. Prime contractors will be held accountable for all work, whether they are conducting it directly or through subcontractors. We will inform you promptly if this approach changes.

memorandum

DATE: April 10, 1998

REPLY TO
ATTN OF: EM-10 (L. Vaughan:6-2523)

SUBJECT: Delegation Authority of Approval for 10 CFR 830.120 Quality Assurance Programs/Implementation Plans and 10 CFR 835 Radiation Protection Programs

TO: Distribution

During the past two months, I have received several requests to delegate approval authority of 10 CFR 830.120 Quality Assurance Programs/Implementation Plans and 10 CFR 835 Radiation Protection Programs to various Field/Operations Office Managers. It is expected that as Field/Operations Offices move from the Management and Operations contract mode to Management and Integration and eventually to the Performance Based Incentive contract mode, requests for delegation of approval authority will increase. This memorandum supersedes all Office of Environmental Management (EM) memoranda granting delegation of approval authority issued before this date, including the EM memo dated March 1, 1996, which provided guidance on delegation of approval for Quality Assurance Programs/Implementation Plans.

Procedural Rules for DOE Nuclear Activities, 10 CFR 820, specifically authorizes the Secretarial Officer with primary responsibility for the activity to which the nuclear safety requirement relates, to grant exemption from Part 830.120 and the Secretarial Officer for Environment, Safety and Health from Part 835, when the criteria for such relief are met. The regulation precludes the delegation of such exemption relief to anyone else within the Department.

On the other hand, it is clear that all other approvals may be delegated by the cognizant Secretarial Officer. Section 5.1.5.2 of DOE-STD-1082-94, Preparation, Review and Approval of Implementation Plans for Nuclear Safety Requirements, specifically describes conditions under which such delegation of approval authority may be appropriate. Consideration to delegate approval is typically for new plans which are preceded by DOE Orders on the same subject or revisions to previously approved plans. Section 5.1.5.2 also states, "The authority to approve exemptions to rules cannot be delegated." Therefore, if any plans contain exemption(s), delegation of approval is not an option.

Given these provisos, I hereby delegate to you approval authority of Price Anderson Quality Assurance Programs/Implementation Plans and Radiation Protection Programs (RPP), including revisions, for the EM sites which you have responsibilities, under the following conditions:


- the plans do not contain an exemption relief from DOE nuclear safety requirements as set forth in 10 CFR 820, Subpart E,
- the contractor and DOE-EM (both Headquarters and Field elements should participate as part of the review team) establish a "dialogue early" in the QA Implementation Plan/RPP development process to discuss proposed implementation plans and programmatic responsibilities (i.e., funding, mission, and milestone/schedules),

- "funding requirements are consistent" with current budget allocations and the administration's out year budget targets, and
- a readiness assessment (if required) with DOE involvement is conducted before work begins.

I strongly support the process identified in the DOE-Standard-1082-94 (see attached DOE memo dated September 9, 1994), specifically Section 5.1, which encourages early (i.e., before the submittal of the Implementation Plans) and continuous dialogue between the implementing organization (the contractor) and the Review Team. Early dialogue was the key element in reviewing and approving previous Implementation Plans in a timely manner and will greatly expedite review and approval of future plans.

To assist you in establishing early dialogue with Headquarters and your contractor, I recommend you contact the Working Group Leader for each rule: Dr. Maria Gavrilas-Guinn on (202) 586-2232, for 10 CFR 835 "Radiation Protection Program" and Mr. Larry Vaughan on (202) 586-2523, for 10 CFR 830.120 "Quality Assurance Program/Implementation Plans."

Please contact Dr. Gavrilas-Guinn or Mr. Vaughan if you have any questions.

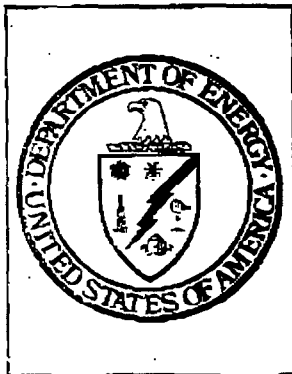

James M. Owendoff
Acting Assistant Secretary for
Environmental Management

cc:

B. Clark, EM-10
D. Berkovitz, EM-20
M. Frei, EM-30
J. Fiore, EM-40
G. Boyd, EM-50
D. Huizenga, EM-60
E. Schmitt, EM-70
C. Peabody, EM-4
M. Gavrilas-Guinn, EM-4
L. Vaughan, EM-10
H. Himpler, EM-30
J. Antizzo, EM-30
R. Smyth, EM-40
T. Evans, EM-50
A. Szilagyi, EM-60
K. Christopher, EH-2
R. Black, EH-31
J. Craig, DOE-FN
T. Rowland, DOE-WV
J. Lampley, DOE-GJ

Distribution:

Manager, Albuquerque Operations Office
Manager, Chicago Operations Office
Manager, Idaho Operations Office
Manager, Nevada Operations Office
Manager, Oak Ridge Operations Office
Manager, Ohio Field Office
Manager, Richland Operations Office
Manager, Rocky Flats Field Office
Manager, Oakland Operations Office
Manager, Savannah River Operations Office
Manager, Carlsbad Area Office



UNCLASSIFIED
FACSIMILE
MESSAGE

U.S. DEPARTMENT OF ENERGY
OFFICE OF LABORATORY OPERATIONS & ES&H
ER-80, MS-F-237GTN
GERMANTOWN, MD 20874-1290

DATE:

TO: Karen Brown
ORO

PHONE:
FAX: 423-576-4046

FROM: Ray Schwartz
ER-83

PHONE: 301-903-4909
FAX: 301-903-7047

COMMENTS:

Karen —
This letter went out in response
to the OR request, but since
it was determined that ER would
delegate to all ER affected Ops
Offices, the OR correspondence
was not referenced. Ray

This transmittal consists of 3 pages (INCLUDING COVER SHEET)

memorandum

**RETAIN
PERMANENTLY**

DATE: April 10, 1998

REPLY TO
ATTN OF: EM-10 (L. Vaughan:6-2523)

SUBJECT: Delegation Authority of Approval for 10 CFR 830.120 Quality Assurance Programs/Implementation Plans and 10 CFR 835 Radiation Protection Programs

TO: Distribution

During the past two months, I have received several requests to delegate approval authority of 10 CFR 830.120 Quality Assurance Programs/Implementation Plans and 10 CFR 835 Radiation Protection Programs to various Field/Operations Office Managers. It is expected that as Field/Operations Offices move from the Management and Operations contract mode to Management and Integration and eventually to the Performance Based Incentive contract mode, requests for delegation of approval authority will increase. This memorandum supersedes all Office of Environmental Management (EM) memoranda granting delegation of approval authority issued before this date, including the EM memo dated March 1, 1996, which provided guidance on delegation of approval for Quality Assurance Programs/Implementation Plans.

Procedural Rules for DOE Nuclear Activities, 10 CFR 820, specifically authorizes the Secretarial Officer with primary responsibility for the activity to which the nuclear safety requirement relates, to grant exemption from Part 830.120 and the Secretarial Officer for Environment, Safety and Health from Part 835, when the criteria for such relief are met. The regulation precludes the delegation of such exemption relief to anyone else within the Department.

On the other hand, it is clear that all other approvals may be delegated by the cognizant Secretarial Officer. Section 5.1.5.2 of DOE-STD-1082-94, Preparation, Review and Approval of Implementation Plans for Nuclear Safety Requirements, specifically describes conditions under which such delegation of approval authority may be appropriate. Consideration to delegate approval is typically for new plans which are preceded by DOE Orders on the same subject or revisions to previously approved plans. Section 5.1.5.2 also states, "The authority to approve exemptions to rules cannot be delegated." Therefore, if any plans contain exemption(s), delegation of approval is not an option.

Given these provisos, I hereby delegate to you approval authority of Price Anderson Quality Assurance Programs/Implementation Plans and Radiation Protection Programs (RPP), including revisions, for the EM sites which you have responsibilities, under the following conditions:

- the plans do not contain an exemption relief from DOE nuclear safety requirements as set forth in 10 CFR 820, Subpart E,
- the contractor and DOE-EM (both Headquarters and Field elements should participate as part of the review team) establish a "dialogue early" in the QA Implementation Plan/RPP development process to discuss proposed implementation plans and programmatic responsibilities (i.e., funding, mission, and milestone/schedules),


SC-10-02

- "funding requirements are consistent" with current budget allocations and the administration's out year budget targets, and
- a readiness assessment (if required) with DOE involvement is conducted before work begins.

I strongly support the process identified in the DOE-Standard-1082-94 (see attached DOE memo dated September 9, 1994), specifically Section 5.1, which encourages early (i.e., before the submittal of the Implementation Plans) and continuous dialogue between the implementing organization (the contractor) and the Review Team. Early dialogue was the key element in reviewing and approving previous Implementation Plans in a timely manner and will greatly expedite review and approval of future plans.

To assist you in establishing early dialogue with Headquarters and your contractor, I recommend you contact the Working Group Leader for each rule: Dr. Maria Gavrilas-Guinn on (202) 586-2232, for 10 CFR 835 "Radiation Protection Program" and Mr. Larry Vaughan on (202) 586-2523, for 10 CFR 830.120 "Quality Assurance Program/Implementation Plans."

Please contact Dr. Gavrilas-Guinn or Mr. Vaughan if you have any questions.


James M. Owendoff
Acting Assistant Secretary for
Environmental Management

cc:

B. Clark, EM-10
D. Berkovitz, EM-20
M. Frei, EM-30
J. Fiore, EM-40
G. Boyd, EM-50
D. Huizenga, EM-60
E. Schmitt, EM-70
C. Peabody, EM-4
M. Gavrilas-Guinn, EM-4
L. Vaughan, EM-10
H. Himpler, EM-30
J. Antizzo, EM-30
R. Smyth, EM-40
T. Evans, EM-50
A. Szilagyi, EM-60
K. Christopher, EH-2
R. Black, EH-31
J. Craig, DOE-FN
T. Rowland, DOE-WV
J. Lampley, DOE-GJ

Distribution:

Manager, Albuquerque Operations Office
Manager, Chicago Operations Office
Manager, Idaho Operations Office
Manager, Nevada Operations Office
Manager, Oak Ridge Operations Office
Manager, Ohio Field Office
Manager, Richland Operations Office
Manager, Rocky Flats Field Office
Manager, Oakland Operations Office
Manager, Savannah River Operations Office
Manager, Carlsbad Area Office